

TEPA/DLPC

SUMMARY OF APPARENT VIOLATIONS

OPERATOR

Name <u>SAMUEL WHITE (PEACH PLANT)</u>	Name <u>JOHN LUTAI</u>
Address <u>410 MOBILE STREET</u>	Address <u>SAME AS OWNER</u>
City <u>SARASOT</u>	City
State <u>FL</u> Zip <u>33501</u>	State Zip
Phone # <u>611/271-4055</u>	Phone #

TITLE

PHONE #

ROBERT ROSSI	PLANT NBR - AMERICAN BOTTOM	618/337-1710
JOHN LOZZY	PLANT NBR - SUGAR WATP	618-271-4085

AGENCY/TITLE

PHONE #

STEVE NEBLITT	EPS-1	TEPA	618-346-5100
JEFF SILKENBACHER	EPS-1	TEPA	"

AGENCY/TITLE

PHONE #

STEVE NOBILTT	EDJ-1	ICDA	618-346-5720
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[illegible][illegible][illegible]

MEMORANDUM

DATE: July 9, 1990
TO: Division File
FROM: Steve Noblitt, DLPC-Collinsville
SUBJECT: Sauget / Sauget Waste Water Treatment Plant
St. Clair County - 1631215003

On June 14, 1990 this office received a complaint stating that Sauget Waste Water Treatment Plant (P-Chem Plant) was currently excavating contaminated sludge from two of their storm water surge lagoons and that the activity had been occurring over the past several days. The complainants concern was that the material was potentially hazardous, possibly contaminated with PCB's. The complainant further stated that the material was being transported to BFI landfill in Belleville by Barbier Trucking, a licensed special waste hauler.

Jeff Schoenbacher and I visited Sauget WWTP late in the afternoon of June 14 to determine the validity of the complaint. We observed at a distance that excavation of at least one of the storm water surge lagoons had been conducted. Jeff Schoenbacher and I then went to BFI to review their past weeks records of incoming waste. Because no record of a permit for such disposal by Sauget WWTP at BFI could be found in our office, it was our intention to uncover a permit violation by Sauget and BFI in connection with the lagoon sludge disposal. Upon reviewing BFI manifests it could not be adequately determined that such waste was received at the landfill during the past week.

According to Nick Mahlandt, IEPA-DWPC, the lagoons in question receive untreated waste water during periods of storm conditions. Water entering the lagoons does not pass through clarifiers. It's only treatment is by addition of lime. Water remains in the lagoons until capacity of the P-Chem plant warrants treatment. Our offices concern at that point was that since the water had not been treated, contaminants in the water would settle out in the form of potentially hazardous sludge.

On June 15, 1990 Jeff Schoenbacher and I arrived at the P-Chem Plant and observed excavation activities taking place. We determined that loads were not being disposed of at BFI but at Laidlaw in Belleville. Upon our arrival at the landfill we instructed the landfill operator to deny the trucks access to the

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site until we could determine if the necessary permit existed. We phoned our office and learned that no documentation existed on the specific sludge. Laidlaw, however produced a letter from Ed Bakowski, IEPA-Permits Section, which stated that the sludge in question could be landfilled under Sauget's current permit for filter cake. That letter referred to a previous conversation between Mr. Bakowski and Robert Roddy of American Bottoms WWTF. The letter explained that since the storm water lagoon sludge and the filter cake are "characteristically identical", based on American Bottoms own analysis, the material is acceptable under the already existing permit and no additional permits need be applied for by Sauget. After review of the paper work we took samples from each of three trucks at the landfill. We also pulled samples at the working area of the landfill where the loads were dumped. Those particular samples were split with Sauget. Samples are to be analyzed for E.P. Tox metals, organics and PCB's.

On June 18 a meeting was held with Mr. Roddy and Jon Lotzy, P-Chem Plant Manager, to discuss the excavation. Mr. Roddy explained that, as discussed with Ed Bakowski, the storm water sludge and filter cake were characteristically the same. Mr. Roddy produced a great deal of sample results from over the past year to show that the material was not hazardous. Samples from the landfill that were split with Sauget were also run and showed no levels that caused concern. We arrived at the agreement that over the remaining course of the project, approximately five more weeks, the facility will submit to us on a weekly basis, sample results of the material excavated and landfilled.

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C-90-64-S

D.L.P.C. COMPLAINT INVESTIGATION FORM

1631215003 - SE CLAIR
SAUGET 1 SAUGET WNTD
Date Received 6/14/90 By GIPANT By Phone In Person By Mail
Complainant ANONYMOUS Respondent SAUGET WNTD
Address Address #10 MARILL AVE
Telephone Telephone 618-271-4235
Directions To Source SAUGET
Complaint Details FACILITY EXCAVATING SLOUGH FROM POND'S PAID DUMPING
AT BEI IN BOLEVILLE. SLUDGE HAS STRONG ODOOR & OIL APPEARANCE
FEAR PCB CONTAMINATION

INVESTIGATION FINDINGS

Date 6/16/90 Time 10:30 By NEBUTT / S. HENNINGSEN
Interviewed Weather 85°-90° Photos 13
Violations Observed SEE REMARKS PAGE

Respondent's Remarks

FOLLOW-UP ACTION

Refer To
File Opened Yes No

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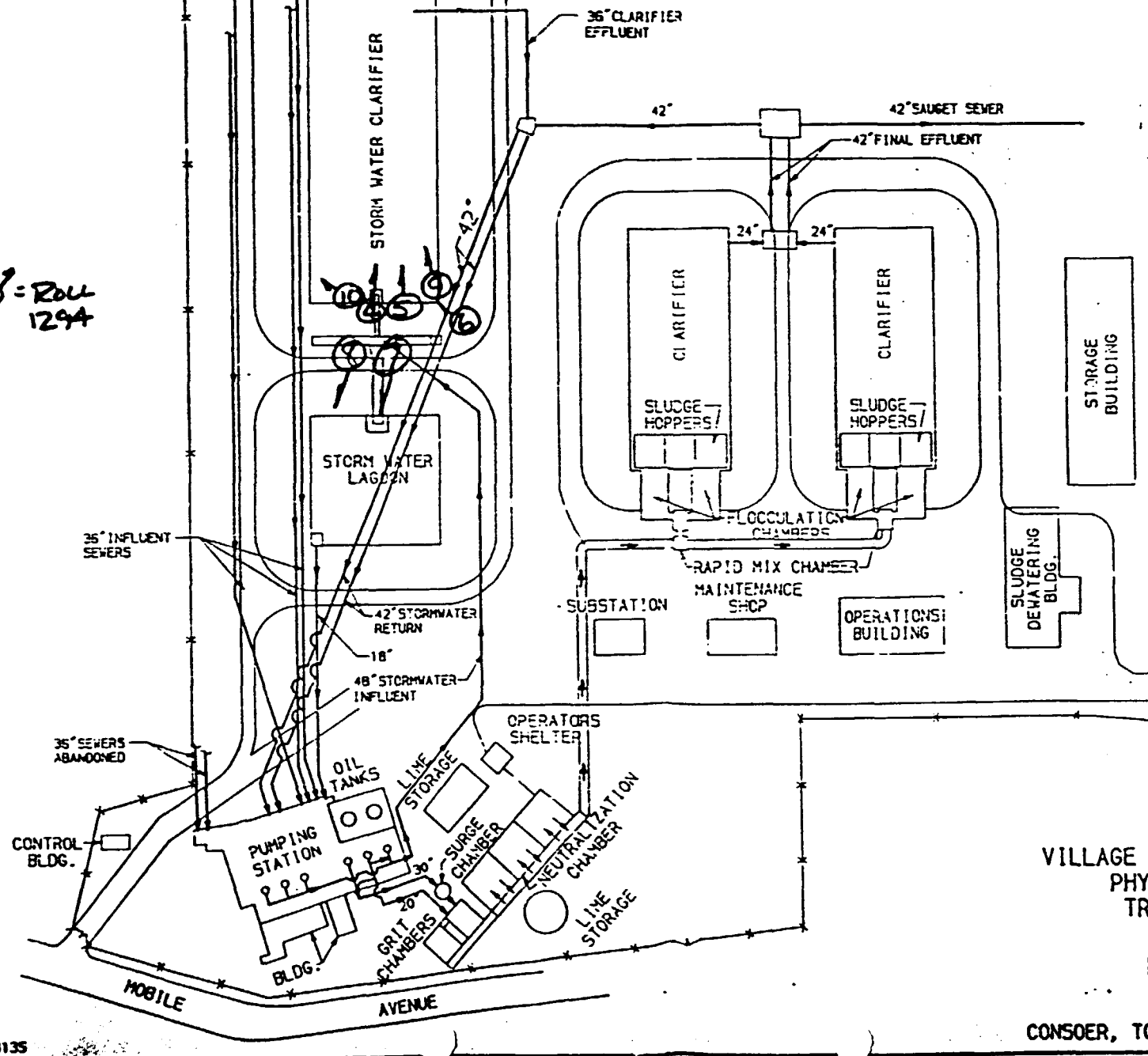
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Roll
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VILLAGE OF SAUGET, ILLINOIS
PHYSICAL/CHEMICAL
TREATMENT PLANT
SITE PLAN

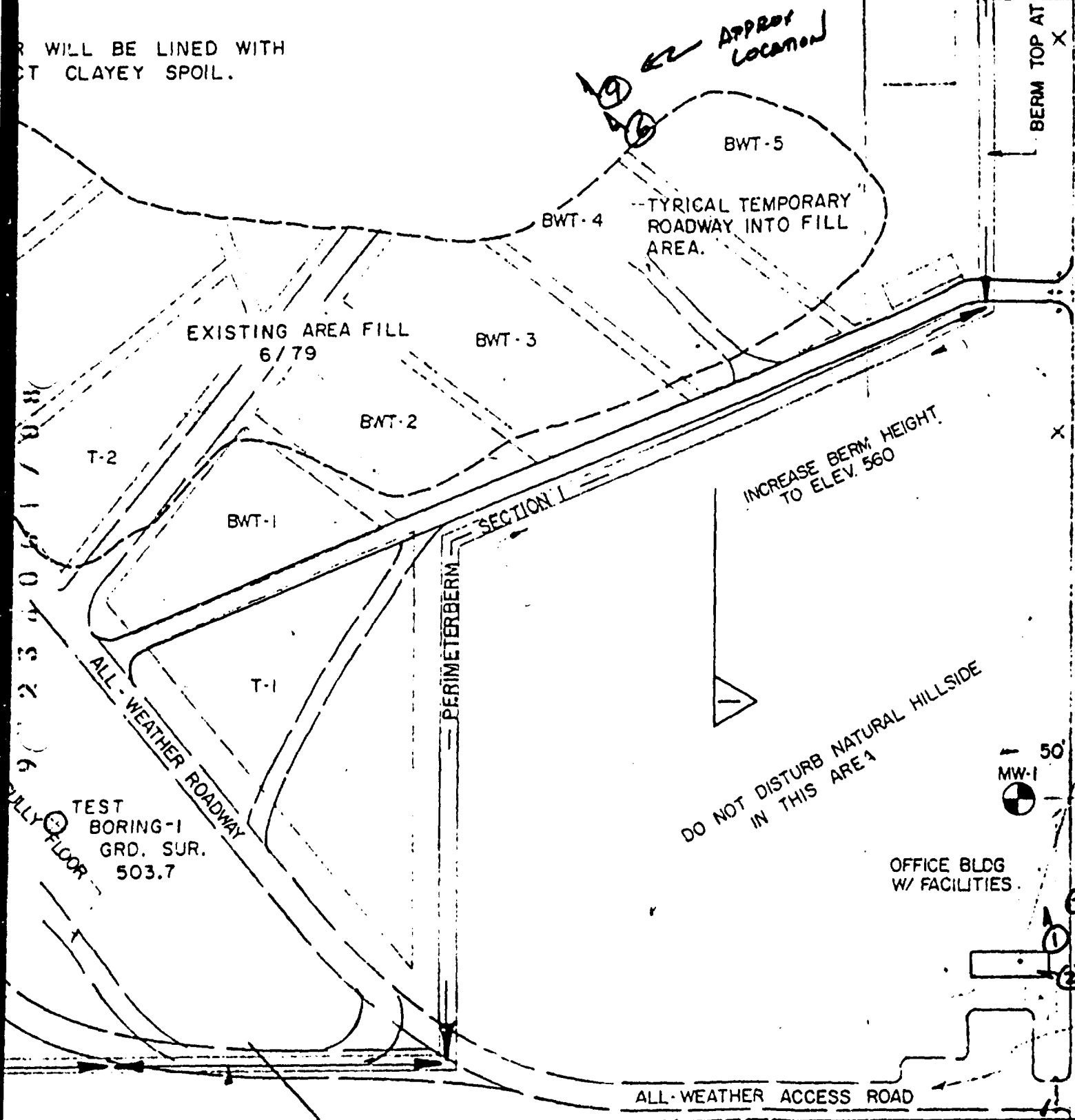
FIGURE III-5

SCALE: 1"=80'

CONSOER, TOWNSEND & ASSOCIATES, INC.

SO THAT IT IS AT LEAST 50' AHEAD OF ADJACENT FILL. USE TEMP.
BERMS/DITCHES, ETC. IN CUT TO MINIMIZE WATER AT TOE OF FILL.
FILL INVERT SHOULD BE AT ELEVATION ± 520.

R WILL BE LINED WITH
CT CLAYEY SPOIL.



CONST. BERM & ROAD -
SEE SEC. 3 DTL.

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LAWLAW BELLEVILLE

RECEIVED STL. GATE LOCK

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